

UNITED STATES DISTRICT COURT
Eastern DISTRICT OF NEW YORK

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HAZEL JOHNSON

Plaintiff

VERIFIED COMPLAINT

-against-

DOCKET NO.

CITY OF NEW YORK

PLAINTIFF DEMANDS TRIAL BY JURY

Defendant

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The Plaintiff, by and through his attorney, Lawrence Lewis, alleges as follows:

ONE: That this Honorable court has jurisdiction of this cause of action pursuant to Title 28, Sections 1331 and 1343 of the United States Code.

TWO: That venue exists in this Honorable Court in that this is the judicial district in which the events that gave rise to this cause of action took place.

THIRD: That at all times mentioned herein the City of New York was a municipal corporation duly organized and existing pursuant to the laws of New York.

FOURTH: That within ninety days of the date in which this cause of action arose the corporation counsel for the City of New York was served with a Notice of claim setting forth the name and address of the claimant and his attorney, the nature of the claim, the time, place and manner it took place and the damages and injuries as a result thereof known at the Notice of Claim was served.

FIFTH: That on the date this cause of action arose the Plaintiff was a 58 year old grandmother with a Masters of Public Affairs and Administration and was and continues to be employed in the Defendant's HRA Department for the past six years as an Opportunity and Eligibility Specialist Hearing and not ever other then this suit filed a claim against the City and/or State of New York nor has received Medicare Benefits .

SIXTH: That the Defendant retained the law firm of Billig Law Firm to conduct the 50-h Comptroller's Hearing on May 15, 2017, was conducted by the firm's founder, Suzanne Billig and covered 50 pages

SEVENTH: That this cause of action has been commenced within one year and ninety days after it initially arose.

EIGHTH: That at the time this cause of action arose the Plaintiff was and continues to live at 2302 34th Street, Astoria, New York in Apartment 5C and has been living in this Apartment for a number of years..

NINTH: That Leslie Sessoms has and continues to live at 2302 34th Street, Astoria, New York, in Apartment 3A and has been living in this Apartment for a number of years .

TENTH: That since 2011 and especially 2014, 2015 and 2016, Leslie Sessoms has continued to harass, stalk, torment, threatened to hit the Plaintiff with her cane and curses at the Plaintiff and using vulgar language directed at her whenever she sees the Plaintiff coming in or out of the building without any cause or provocation whatsoever on the part of the Plaintiff.

ELEVENTH: That as a result of the foregoing The Plaintiff has filed a number of complaints for harassment and aggravated harassment against Leslie Sessoms in the nearby police precinct station but members of the New York City Police Department have failed to arrest, question, warn or take any actions on the complaints filed by the Plaintiff against Leslie Sessoms to prevent her from continuing her harassment, stalking, tormenting, threatening physical force or vulgar language she uses when speaking to the Plaintiff.

TWELTH: That on January 25, 2017 at approximately 7:30 PM the Plaintiff was coming home from and stopped to talk with a neighborhood acquaintance when Leslie Sessoms pepper sprayed the Plaintiff without any cause or provocation whatsoever on her part and as she did so saying I hate that bitch, about one block away from the building they both lived in.

THIRTEENTH: That as the Plaintiff ran for the safety of her building with Leslie Sessoms running close behind the Plaintiff she heard Leslie Sessoms on her cell phone tell her sister Lavern Sessoms, "Laverne she coming to the to the building, get that bitch" referring to the Plaintiff.

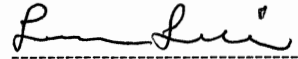
FOURTEETH : That as the Plaintiff tried to enter her building Laverne Sossoms greeted the Plaintiff at the door and assaulted the Plaintiff by repeatedly punching her without any cause or provocation whatsoever on her part.

FIFTEENTH: That Members of the New York City Police Department arrived at the Plaintiff's building and she went downstairs to file a complaint against Leslie Sossoms for pepper spraying her and Laverne Sossoms for assaulting her as she tried to enter her building without any cause or provocation whatsoever by the Plaintiff as to both the assault and pepper spraing based on what had happened to her once she was pepper sprayed by Leslie Sessomsshe tried to enter her building which was confirmed by a number of eyewitnesses to the whole incidentarraigned after the spending the night in jail and was released on his own recognizance since he had never been arrested or locked up in his 58 years living in the United States and obtaining a masters in emergency and disaster management and a license as a professional emergency technician.

SIXTEENTH: That in spite of the Plaintiff being pepper sprayed and then assaulted without any cause or provocation whatsoever which was confirmed by a number of eyewitnesses the police officers in credibly falsely arrested and imprisoned her under the color and authority of the laws of New York, charging the Plaintiff charging with assault in the third degree a misdemeanor, thereby depriving her of the protections ,immunities, privileges and civil rights guaranteed to her by and under the constitution of the United States Constitution and the pain and suffering endured by the Plaintiff until the criminal charge was dismissed at the arraignment the Plaintiff is entitled to one million dollars.

WHEREFORE the Plaintiff demand a judgement against the Defendant in the sum of One million dollars.

Dated August 22, 2017
New York, NY

A handwritten signature in black ink, appearing to read "Lawrence Lewis", written over a horizontal dashed line.

Lawrence Lewis
Attorney for Plaintiff
276 5th Avenue
New York, NY 10001
(212) 689-4025

ATTORNEY'S VERIFICATION

LAWRENCE LEWIS, an attorney duly licensed to practice law in the State of New York, hereby affirms the following statements to be true under the penalties of perjury:


First: I am the attorney of record for the Plaintiff herein. I have read the foregoing Verified Complaint, and know the contents thereof; the same is true to my own knowledge, except as to the matters therein stated to be alleged on information and belief, and as to those matters I believe them to be true.

This Verification is made by me and not by the Plaintiff because Plaintiff does not live in this County, the County in which my office is located.

The grounds of my belief as to all matters not stated to be upon my knowledge are as follows:

Interviews with the Plaintiff, review of records, reports, documents, and letters contained in the file.

Dated: New York, New York
August 21st, 2017P



Lawrence Lewis